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Eric L. Chase Member

October 11, 2011

Via E-mail and Regular Mail

TO ALL COUNSEL OF RECORD (See attached)

Re: Lia v. Saporito, Civil Case No. CV-11-3621 (E.D.N.Y. 2011)

W&D Imports, Inc. v. Lia, Civil Case No. CV-11-4144 (E.D.N.Y. 2011)

Counsel:

This office represents W&D Imports, Inc. d/b/a Willis Honda ("Willis Honda") and David Davis ("Davis"). We received American Honda's Conditional Assent to the motion to consolidate filed on behalf of Willis Honda and Davis. Rather than address the responses one at a time, Willis Honda and Davis will reply to whatever we receive from Defendants at the same time under the "bundle rule." The reply is due on November 4, 2011.

Very truly yours,

ERIC L. CHASE

Enclosures

cc: (all via ECF):

Honorable Sandra J. Feuerstein, U.S.D.J.

Honorable E. Thomas Boyle, U.S.M.J.

Honorable Nicholas G. Garaufis, U.S.D.J.

Honorable Stephen M. Gold, U.S.M.J.

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COUNSEL LIST*

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W&D Imports, Inc. v. Lia, Civil Case No. CV-11-4144 (E.D.N.Y. 2011):

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^{*}All Counsel served via email and regular mail.